Dear Members of the Connecticut Siting Council;

I am writing to ask the Connecticut Siting Council to deny or severely restrict the extension of the Certificate that Kleen Energy and its partners request to complete the 620-megawatt power plant in Middletown.

What are the changed conditions that exist now? When the existing certificate was issued, the State of CT was using the Uniform Building Code as its standard. Since then, the State of CT, has adopted the International Building Code, as indicated on the www.ct.gov website. Connecticut is now using the IBC 2003 Building Code as its standard. Please do not allow the Kleen Energy Plant to be grandfathered in on the old building code.

What does that mean to the Kleen Energy extension of its Certificate? The IBC 2003 code references another document for post installed anchors, ACI 318 Appendix D, Section D, 2.1, *(Please note that unless otherwise noted, all references to the International Building Code (IBC) shall include the 2003 IBC, 2006 IBC and 2009 IBC, and that unless otherwise noted, all references to ACI 318 Appendix D shall include ACI 318-02 Appendix D, ACI 318-05 Appendix D, and ACI 318-08 Appendix D)* which require the use of ICC-ES Code Compliant anchors be used for post install mechanical anchors. Should you grant an extension to the existing certificate, I would ask that you require the contractors of the Kleen Energy Plant to replace *all* the mechanical and adhesive anchoring systems, in both the 80% completed portion of the existing structure and also in the 20% that is currently being rebuild, with only Code Compliant anchors.

Code Compliant anchors are manufactured to take into account the theory that all concrete cracks. With that in mind, seismic activity being a distinct possibility, and with the Feb 7th, 2010 explosion, certainly the concrete present in the foundations of the Kleen Energy Plant, has cracked.

It is also imperative that the entire structure of the plant be examined, especially by a geologist and other qualified Building Inspectors with this information in hand. Since the plant is built on old mine shafts, how sturdy is the foundation? Structural engineers need to see if the foundation can safely support the massive weight of the power plant.

I have enclosed a link http://www.powers.com/jack_video.html to a commercial video that educates Structural Engineers on the new requirements of the IBC Building Code. If you will move the time marking to 3:52-18:10 and 20:24-26:01, you can review the educational portion of this video as it relates to post install code compliant anchors. The video is approximately 38 minutes in length, some of it is of a commercial nature, but most of it has valuable information about the new building code requirement.

Thank you,
Robert Rosenberg, private citizen living 2,500 ft from the Kleen Energy Plant.